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20 **UNITED STATES DISTRICT COURT**

21 **DISTRICT OF NEVADA**

22 NAVAJO HEALTH FOUNDATION – SAGE  
 23 MEMORIAL HOSPITAL, INC. (doing business  
 24 as “Sage Memorial Hospital”); an Arizona non-  
 25 profit corporation

26 Plaintiff,

27 v.

28 RAZAGHI DEVELOPMENT COMPANY,  
 LLC; a Nevada limited liability company (doing  
 business as “Razaghi Healthcare”), et al.,

Defendants.

Case No. 2:19-cv-00329-GMN-EJY

**JOINT STIPULATION TO  
 EXTEND TIME FOR  
 DEFENDANTS TO RESPOND TO  
 PLAINTIFF’S THIRD AMENDED  
 COMPLAINT [ECF NO. 192] AND  
 TO FILE REPLY IN SUPPORT OF  
 DEFENDANTS’ MOTION FOR  
 RULE 11 SANCTIONS [ECF NO.  
 174]**

**(FIRST REQUEST REGARDING  
 THIRD AMENDED COMPLAINT  
 AND FOURTH REQUEST  
 REGARDING REPLY TO  
 MOTION FOR RULE 11  
 SANCTIONS)**

IT IS HEREBY STIPULATED AND AGREED, pursuant to FRCP 6 and LR IA 6-  
 1 and subject to this Court’s approval, that Defendants Razaghi Development Company,

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1 LLC, Ahmad Razaghi, and Tausif Hasan (collectively “Defendants”) shall have an  
 2 extension of time, up to and including July 22, 2022 to respond to or otherwise answer  
 3 Plaintiff’s Third Amended Complaint (ECF No. 192 filed May 20, 2022). The parties also  
 4 stipulate and agree that Defendants shall have up to and including June 24, 2022 to submit  
 5 their reply in support of Defendants’ Motion for Rule 11 Sanctions (ECF No. 174 filed  
 6 March 10, 2022).

7 The parties stipulate to the above extensions due to defense counsels’ current case  
 8 load and in consideration of the complexity of the issues in this case and the length and  
 9 breadth of the Third Amended Complaint. Specifically, the Third Amended Complaint is  
 10 132 pages with 278 numbered paragraphs, not including subparts. Defendants require  
 11 additional time to evaluate the allegations and prepare their response thereto. This is the first  
 12 request to extend Defendants’ deadline to respond to the Third Amended Complaint.

13 Further, because Defendants’ Motion for Rule 11 Sanctions is based upon  
 14 allegations in the complaint(s), Defendants need additional time to prepare their reply in  
 15 support of that motion given the filing of the Third Amended Complaint and the new  
 16 allegations raised therein. Although this is the fourth requested extension of this deadline,  
 17 because the allegations in the Motion for Rule 11 Motion are tied to the complaint(s) as  
 18 stated herein, the first three extensions were submitted in conjunction with and due to  
 19 Plaintiff’s request to extend its deadline to file the Third Amended Complaint. This is the  
 20 first requested extension after Plaintiff filed the Third Amended Complaint. Further,  
 21 Defense counsel seeks the requested extension due to an illness in counsel’s family which  
 22 has required him to be away from the office for the past several weeks.

23 This request is made in good faith and not for the purpose of delay. Neither party  
 24 will be prejudiced by the requested extension.

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For the reasons set forth above, the parties ask the Court to approve this stipulation and the following deadlines:

- a. Defendants shall have up to and including **July 22, 2022** to respond to or otherwise answer the Third Amended Complaint (ECF No. 192);
- b. Defendants shall have up to and including **June 24, 2022** to submit their reply in support of Defendants' Motion for Rule 11 Sanctions (ECF No. 174).

The parties have so stipulated.

RESPECTFULLY SUBMITTED this 1st day of June 2022.

/s/ Paul Padda (with permission)

Kathleen Bliss, Esq.  
Paul S. Padda, Esq.  
David Stander, Esq.  
Douglass A. Mitchell, Esq.  
*Counsel for Plaintiff, Counterdefendant  
and Third-Party Defendants*

/s/ Kris Leonhardt

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Kris Leonhardt, Esq.  
Nermana Pehlic, Esq.  
Jeffrey D. Winchester, Esq.  
*Counsel for Defendants*

IT IS SO ORDERED:

  
UNITED STATES MAGISTRATE JUDGE

Dated: June 2, 2022

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